

1 [Parties and Counsel Listed on Signature Pages]
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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8 IN RE: SOCIAL MEDIA ADOLESCENT
9 ADDICTION/PERSONAL INJURY PRODUCTS
10 LIABILITY LITIGATION

11 THIS DOCUMENT RELATES TO:
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*People of the State of California, et al. v. Meta
Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND STATE AGS'
STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINES TO
SUBSTANTIALLY COMPLETE STATE
AGENCY DOCUMENT PRODUCTION
AND DEPOSITIONS**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-2 and 7-12, the State Attorneys General (“State AGs”) and
 2 Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms
 3 Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel,
 4 hereby stipulate as follows:

5 1. Under the schedule ordered by Magistrate Judge Kang on December 31, 2024 (ECF 1495),
 6 the deadlines for State AGs and state agencies to complete substantial production of documents range
 7 from mid-January to early February 2025 (extended to late February 2025 for one State, Kentucky). *See*
 8 ECF 1495, 1495-1.

9 2. The State AGs have represented to Meta that all but one of the State AGs have met their
 10 substantial completion deadlines with respect to documents produced from their respective State AG
 11 offices. Discussions about the State AGs’ responses to two remaining RFPs in Meta’s Third Set of RFPs
 12 are still ongoing, and any productions made pursuant to those discussions will be completed by the end of
 13 the current fact discovery period, April 4, 2025.

14 3. As of February 10, 2025, at least one agency in the following States had not met its
 15 substantial completion deadline, as ordered by Magistrate Judge Kang on December 31, 2024 (ECF 1495):
 16 Arizona, California, Colorado, Hawaii, Illinois, Kansas, Louisiana, Nebraska, New Jersey, New York,
 17 Pennsylvania, South Carolina, Wisconsin, and Virginia. *See* ECF 1669 at 2 n.2; 1675 at 2 n.2. Other
 18 States have already sought extensions of that deadline from the Court.

19 4. Meta is currently required to complete depositions of all State witnesses¹ by April 4, 2025,
 20 with many States having presumptive deposition windows that close even earlier. *See* ECF 1495, 1495-
 21 1.

22 5. In light of many States not having substantially completed productions from some
 23 agencies, or anticipating not substantially completing productions by their current deadlines, and given
 24 the resulting short time period for Meta to review and effectively take depositions of State witnesses, the

26 ¹ References to “depositions of State witnesses” throughout this stipulation and proposed order mean Rule
 27 30(b)(6) and fact depositions of State AGs and state agencies, and their current and former employees,
 28 pursuant to deposition notices and/or subpoenas.

1 Parties agree, subject to Court approval, to extend the deadlines (1) for the States to substantially (and
 2 then fully) complete document productions and, in turn, (2) for Meta to take depositions of State witnesses.
 3

4 6. The Parties agree to continue working cooperatively and diligently to advance agency
 5 document productions, including the State AGs' and state agencies' agreement to collect, review, and
 6 produce relevant, non-privileged documents returned by agreed-upon search terms and other parameters
 7 on a rolling basis; and Meta's agreement to provide updated search terms to facilitate the meeting of
 8 agreed-upon document review caps (where applicable).

9 7. Absent good cause, Meta and the State AGs agree to finalize, and, if necessary, brief, all
 10 disputes about the scope of the State AGs' and state agencies' responses and objections to Meta's existing
 11 RFPs by March 14. For avoidance of doubt, disputes regarding assertions of privilege, redactions,
 12 confidentiality designations, and the sufficiency of the State AGs' and state agencies' productions are not
 13 encompassed by this paragraph. The extension of the deadline for Meta to complete fact and Rule 30(b)(6)
 14 depositions of State witnesses does not and will not affect any other deadlines already set or that may be
 15 set regarding disputes over written discovery.

16 8. The Parties further agree that the overall hours limit for depositions of State witnesses is
 17 629 hours on the record, with a 30-hour cap per State asserting consumer protection claims, and a 12-hour
 18 cap per State asserting only COPPA claims.

19 9. This Court has previously extended the deadlines for state agencies to substantially
 20 complete document productions three times, including initially on agreement of all Parties to the MDL as
 21 part of an MDL-wide schedule extension. *See* ECF 1159, 1380, 1495. The Court granted a further
 22 extension of Kentucky's substantial completion deadline. *See* ECF 1631. New Jersey and certain
 23 California agencies have requested, but have not yet received, further extensions. *See* ECF Nos. 1655,
 24 1663.

25 10. The Court has not extended Meta's deadline to complete depositions.²

26 2 The Court extended the presumptive window for Meta to take depositions of Kentucky witnesses in
 27 conjunction to granting Kentucky's request to extend its substantial completion deadline, ECF 1631, but
 28 (continued...)

11. The changes in these deadlines will not automatically affect other deadlines in the case schedule, but they may or may not require future requests by the Parties and future action by the District Court on other deadlines in the case schedule. The Parties reserve all rights with respect to other changes to deadlines.

12. Therefore, the Parties agree, subject to the Court's approval, that the following deadlines will apply:

- a. Deadline to substantially complete production of all State AG and agency documents: **March 14, 2025**
- b. Parties' deadline to finalize, and, if necessary, brief, all disputes about the scope of the State AGs' and state agencies' responses and objections to Meta's existing RFPs: **March 14, 2025**
- c. Deadline to complete production of all State AG and agency documents: **April 4, 2025**
- d. First date on which Rule 30(b)(6) depositions of State witnesses may be taken: **April 7, 2025**
- e. Deadline for Parties to meet and confer to identify and commence scheduling individual State fact witness depositions (*and* to meet and confer regarding any such disputes): **May 9, 2025**
- f. Deadline for Meta to serve deposition notices for individual State fact witness depositions: **May 30, 2025**
- g. Meta's deadline to complete fact and Rule 30(b)(6) depositions of State witnesses: **July 18, 2025**
- h. Overall hours limit for depositions of State witnesses: **629 hours** on the record, with a **30-hour cap** per State asserting consumer protection claims, and a **12-hour cap** per State asserting only COPPA claims.

did not extend Meta’s *deadline* to complete depositions of Kentucky’s 30(b)(6) and fact witnesses, which was always April 4, 2025, ECF 1495-1 at 11.

1 **IT IS SO STIPULATED AND AGREED.**
2

3 Respectfully submitted,

4 DATED: February 13, 2025

5 By: /s/ Megan O'Neill

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1 **SIGNATURE CERTIFICATION**

2 Under Civ. L.R. 5-1(h)(3), I, Megan O'Neill, hereby attest that all signatories listed, and on
3 whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

4 DATED: February 13, 2025

/s/ Megan O'Neill

5 Megan O'Neill

6 *Attorney for Plaintiff the People of the State of*
7 *California*

8 *Co-Lead Counsel for State Attorneys General*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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DATED:

PETER H. KANG
UNITED STATES MAGISTRATE JUDGE